
IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

TERRY ELIZABETH SILVA, <div style="text-align: center;"><i>PLAINTIFF,</i></div> <div style="text-align: center;">vs.</div> MID ATLANTIC MANAGEMENT CORPORATION, FORBES, BENDER, PAOLINO & DiSANTI, AND ALEXANDER A. DiSANTI, Esq. <div style="text-align: center;"><i>DEFENDANTS.</i></div>	§ § § § § § § §	<u>Civil Action</u> 02-3579
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MOTION OF TERRY ELIZABETH SILVA TO EXTEND THE SCHEDULING DEADLINES

Plaintiff, Terry Elizabeth Silva (“Silva”), through her undersigned counsel, hereby moves this Court for an order extending the scheduling deadlines. In support of the motion, Silva avers as follows:

1. The Court conducted a Rule 16 scheduling conference in chambers last fall, and suggested the parties attempt to settle the case because the amount in dispute is small relative to the amount of attorney time that could be expended in litigating the claims.
2. At the end of the conference, the Court entered a scheduling order for discovery, and trial deadlines.
3. Pursuant to the order, discovery was scheduled to end on Friday, February 28, 2003.
4. Plaintiff’s counsel spoke with defense counsel about settlement, and later sent a settlement demand letter.
5. Defense counsel responded with a request for a letter of legal authority setting forth Plaintiff’s legal theories against Defendant.

6. Plaintiff's counsel recently provided that letter to defense counsel, who indicated that he would discuss the matter with his client and report back to Plaintiff's counsel.

7. Although Plaintiff's counsel is hopeful that this matter can be resolved, counsel must be prepared for the contingency that the case will go forward.

8. Plaintiff's counsel seeks to extend all deadlines by sixty (60) days to enable the parties to continue pursuing settlement and also to allow the continuation of discovery in the event the settlement talks are not successful.

9. Plaintiff's counsel contacted defense counsel to ascertain his position on the request to extend the scheduling deadline.

10. Defense counsel reported that he would need to consult with his client.

11. Because the deadline has already recently passed, Plaintiff is filing this motion without writing for his consent.

12. Defendant's are not prejudiced to if the scheduling deadlines are extended, and this may facilitate a resolution of this matter.

WHEREFORE, Plaintiff prays this Honorable Court enter an order extending all deadlines previously established in the Court's scheduling order by sixty (60) days.

Respectfully submitted,

Kenneth J. Benton
Silva & Associates, P.C.
1429 Walnut Street, Suite 900
Philadelphia, PA 19102
(215) 564-0202

Dated: March 5, 2003